

Exhibit C

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X
ALEXANDER WILLIAMS,

PLAINTIFF,

4 -against-

Index No.:

5 19-CV-3347

6 CITY OF NEW YORK, DEPARTMENT OF CORRECTIONS,
7 CORRECTIONAL OFFICER ALEXANDER, DEPUTY RIVERA, CAPTAIN
8 MATHIS, RAMIREZ, MARTINEZ, PADILLO, GREEN, CALLOWAY,
9 OGBURN-SUARES, BAILEY, ESPINOZA, HERNANDEZ, WELLS,
HARVEY, GORRITZ,

DEFENDANTS.

10 -----X

11
12 DATE: January 11, 2021

13 TIME: 5:07 P.M.

14
15 VIRTUAL DEPOSITION of the Plaintiff, ALEXANDER
16 WILLIAMS, taken by the Defendants, pursuant to an Order
17 and to the Federal Rules of Civil Procedure, held at the
18 above date and time via Zoom, before Maryellen Thompson,
19 a Notary Public of the State of New York.
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23
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25

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1 A. Like I said, I didn't represent myself in it,
2 my lawyer represented me. I don't know if it was
3 federal or state. I don't know what statutes he sued
4 under or whatever, I just remember that there was a
5 settlement agreement reached.

6 Q. Okay. Now, in 2013, you said that you had a
7 suit against the NYPD, what were the allegations in
8 that?

9 A. Well, I was picked up for A-1 Possession A-2
10 sale by special narcotics that was acting out of the
11 same precinct where I'm actually charged in a murder
12 case now, and they arrested one woman that had the drugs
13 on her, and then 45 days later, came and arrested me and
14 said they witnessed me pass her the drugs. Long story
15 short, I ended up going to trial, and while the jury was
16 deliberating, I jumped bail. So, when I got caught in
17 2012, I ended up pleaing, and when I plead, mostly
18 likely I couldn't get around that. So, I took the drug
19 time on a concurrent, and since I pleaded guilty under
20 the drug case, the allegations that were involved in the
21 lawsuit was dismissed, because there was no way to
22 prove, you know what I'm saying, due to the fact that
23 there was a conviction attached to the incident.

24 Q. Okay. So, that case was dismissed?

25 A. Right.

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1 asthmatic. So, anytime that them things are sprayed, I
2 seek a treatment for my asthma, or to be contaminated
3 from the area, and in them two occasions, it seemed
4 like, even though the issue wasn't with me, I was in the
5 area that was affected because the units are so small
6 and there's no windows. So, when the spray has already
7 happened in your cell, if the person is running around
8 or whatever, I need to be contaminated, they didn't get
9 me the adequate medical care saying that there was no
10 escorts, or that the clinic is full, or whatever the
11 case may be, but we have a triage right outside the
12 unit, and that's what the legist of the complaint were.

13 Q. And where did this take place?

14 A. In Manhattan Detention Complex Housing Unit
15 Nine North.

16 Q. Do you remember approximately the dates of the
17 incident?

18 A. It may have been February or March of 2020.

19 Q. And who where the defendants in those matters?

20 A. I believe just the City of New York.

21 Q. For both of them?

22 A. Yes, sir. I'm not sure, I believe.

23 Q. Okay. Now, where were you living during the
24 incidents within the three complaints in this matter?

25 A. At the Manhattan Detention Complex 125 White

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1 DOC's to address in reference to my confinement.

2 Q. Are you still under the lockdown order today?

3 A. Yes, sir.

4 Q. What are the restrictions that are in the
5 lockdown order?

6 A. I just explained it. The only way that I can
7 contact the defense people that's in there which is
8 Kevin Hinckson, David Barrett, Jeffrey Chabrowe and
9 Julie A. Clark. I have their office numbers and cell
10 phone numbers, and then he addressed no visitations
11 unless it's from them people. Other than that, those
12 are the only restrictions that I have, and, of course,
13 with 23-and-one, he don't want me to have access to
14 other inmates, and stuff like that, throughout the
15 facility.

16 Q. And specifically, what is 23-and-one mean?

17 A. 23 hours a day you're in your cell, one hour
18 rec, but you're also allowed to engage in law library
19 activities, if it's something like a doctor's
20 appointment, a legal visit, or something of that nature,
21 of course those are minimum standards that are mandatory
22 mandate of services.

23 Q. So, would that be addition to the one hour, or
24 is that all included?

25 A. That's addition to the one standard. The

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1 Q. Why are they signing the logbook?

2 A. To say that they came, Mr. Davison.

3 Q. So, what is the logbook that they're signing?

4 A. The logbook is for any activity that's taking
5 place on the housing unit to my understanding. Again,
6 I'm not an employee for the city or the state or for the
7 Department of Corrections. So, I don't know exactly
8 what the purpose is for, but what I've witnessed, mostly
9 anything that goes on in the housing unit, or if
10 somebody comes in and out, the doctor, mental health,
11 you go to court, something like that, it's logged in the
12 book.

13 Q. Okay. Do you know what intended contraband
14 recipient is?

15 A. Yes.

16 Q. What is it?

17 A. That's when you're labeled to be watched to
18 see if you get contraband or not.

19 Q. You testified before that you were arrested in
20 2012; is that correct?

21 A. Yes.

22 Q. And do you remember what the charges were for
23 that arrest in 2012?

24 A. I was arrested on bail jumping, because I bail
25 jumped while the jury was deliberating. So, I was

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1 captured in another state, brought back to face
2 bail-jumping charges, and to make a determination
3 whether I go back to trial on the drug charges or to
4 take a plea. I decided to take a plea that made it
5 concurrent with the bail-jumping, because there was no
6 sense of taking a chance of blowing trial when I already
7 had to do time.

8 Q. For that, were you incarcerated in D.O.C
9 during that time?

10 A. Yes.

11 Q. You stated that you took a plea for that?

12 A. Yes, sir.

13 Q. When did you start your sentence for that?

14 A. It might have been May of 2013, May or June of
15 2013.

16 Q. How long did that period of incarceration
17 last?

18 A. Four and a half flat. I came home in April of
19 2016.

20 Q. When was the next time that you were in D.O.C
21 custody?

22 A. 2018, March.

23 Q. How long did that period of custody last?

24 A. Mr. Davison, I'm still currently sitting
25 here.